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Shein Distribution Corporation,
Roadget Business Pte. Ltd.,
Zoetop Business Company, Limited
and George Chiao*

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

KRISTA PERRY, an individual;
LARISSA MARTINEZ, an
individual; JAY BARON, an
individual; RACHEL PFEFFER, an
individual; DIRT BIKE KIDZ, Inc.,
a California corporation;
ESTELLEJOYLYNN, LLC, a New
Jersey limited liability company;
JESSICA LOUISE THOMPSON
SMITH, an individual; LIV LEE, an
Individual,

Plaintiffs,

v.

SHEIN DISTRIBUTION
CORPORATION, a Delaware
corporation; ROADGET BUSINESS
PTE., LTD; ZOETOP BUSINESS
CO., LTD.; and GEORGE CHIAO,

Defendants.

Case No. 2:23-cv-05551-MCS-JPR

DISCOVERY MATTER

**DECLARATION OF KIAURA
CLARK IN SUPPORT OF JOINT
STIPULATION REGARDING
PLAINTIFFS' MOTION TO COMPEL**

Discovery Cutoff: October 6, 2025

Pretrial Conference: February 9, 2026

Trial: February 24, 2026

DECLARATION OF KIAURA CLARK

I, Kiaura Clark, declare as follows:

1. I am an attorney with Paul Hastings LLP, counsel for Defendants Shein Distribution Corporation, Roadget Business Pte. Ltd., Zoetop Business Company, Limited, and George Chiao (collectively, “Defendants”). This declaration is submitted in support of the Joint Stipulation Regarding Plaintiffs’ Motion to Compel Defendants’ Responses to Discovery, Production of Documents, Depositions (the “Joint Stipulation”). I have personal knowledge of the facts set forth herein and, if called as a witness, I could and would testify competently to them.

Background Regarding Depositions & Discovery Responses

2. Defendants provided proposed dates for the 30(b)(6) deposition of Shein Distribution Corporation on August 14 and August 28, 2025. A true and correct copy of this correspondence is attached hereto as **Exhibit A**.

3. On August 8, 2025, Defendants memorialized the parties’ meet and confer regarding Plaintiffs’ discovery requests via letter correspondence. A true and correct copy of the letter is attached hereto as **Exhibit B**. A true and correct copy of the cover email attaching the letter correspondence is attached hereto as **Exhibit C**.

Background Regarding Protective Order Dispute

4. On January 6, 2025, in advance of the depositions of Defendant Chiao and Peter Pernot-Day, an employee of one of the SHEIN Defendants, Defendants prepared and circulated a draft protective order to Plaintiffs. A true and correct copy of the January 6, 2025 correspondence is attached hereto as **Exhibit D**.

5. On March 12, 2025, Defendants served responses and objections to Plaintiff Krista Perry’s first set of interrogatories (the “Interrogatory Responses”). In those Interrogatory Responses, Defendants indicated that “[n]o [confidential] information will be provided absent a protective order containing suitable protections regarding, inter alia, the use and disclosure of such information.” A true and correct copy of Shein Distribution Corporation’s Interrogatory Responses, which are

1 representative of the responses given by other Defendants, is attached hereto as
2 **Exhibit E.**

3 6. After following up with Plaintiffs' counsel at least half a dozen times, it
4 was not until March 12, 2025 that Plaintiffs' counsel responded with substantial edits.
5 A true and correct copy of the March 12, 2025 correspondence is **Exhibit F.**

6 7. On March 20, 2025, Defendants sent a letter to Plaintiffs' counsel,
7 which explained that Defendants intended to supplement the Interrogatory Responses
8 at issue, but that "a stipulated protective order . . . is a prerequisite to Defendants
9 disclosing any confidential information in discovery." A true and correct copy of
10 that letter correspondence is attached hereto as **Exhibit G.**

11 8. Also on March 20, 2025, Defendants' counsel sent an email to
12 Plaintiffs' counsel, which explained that "we need a protective order before we can
13 produce our clients' confidential information in response to plaintiffs' discovery
14 requests." A true and correct copy of that correspondence is attached hereto as
15 **Exhibit H.**

16 9. On March 27, 2025, Defendants' counsel arranged for a meet and confer
17 to discuss Plaintiffs' edits to the draft protective order, after which Defendants agreed
18 to make several changes in hopes of reaching a compromise. A true and correct copy
19 of that correspondence is attached hereto as **Exhibit I.**

20 10. Defendants' counsel followed up with Plaintiffs' counsel regarding the
21 status of the protective order on April 15, 2025. A true and correct copy of that
22 correspondence is attached hereto as **Exhibit J.**

23 11. On May 1, 2025, Plaintiffs' counsel responded "we cannot agree to your
24 disputed proposals." A true and correct copy of the May 1, 2025 email
25 correspondence is attached hereto as **Exhibit K.**

26 12. On May 21, 2025, Defendants' counsel noted that "[i]t appears that the
27 parties are now at an impasse" and suggested that the dispute would need to be
28 brought before the Court. That email correspondence is also reflected in **Exhibit K.**

13. The parties continued to discuss the protective order during the parties' meet and confers. On August 8, 2025, Defendants' letter correspondence, which memorialized the parties' meet and confer as to Plaintiffs' discovery requests, again indicated the need for entry of a protective order. That letter correspondence is also reflected in **Exhibit B**.

I declare under penalty of perjury under the laws of the United States of America that the foregoing facts are true and correct.

Executed this 3rd day of September, 2025, at Los Angeles, California.

/s/ Kiaura Clark

Kiaura Clark